

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

SANDRA M. DAVIS,

Plaintiff,

V.

LENDMARK FINANCIAL SERVICES, LLC, )

Defendant.

Civil Case No. 7:15-cv-131

## DECLARATION OF TERRY N. GRIMES

I, Terry N. Grimes, state and affirm as follows:

(1) I am an attorney at law admitted to practice before the Supreme Court of the United States, the United States District Court for the Eastern and Western Districts of Virginia, the United States Court of Appeals for the Fourth Circuit, and the Supreme Court of Virginia.

(2) I graduated from the Marshall-Wythe School of Law at the College of William & Mary in May 1984 with a Doctor of Jurisprudence degree. I graduated from Virginia Polytechnic Institute and State University in 1978 with a Bachelor of Science degree, and from Oregon State University in 1981 with a Master of Science degree. I was licensed by the Virginia Board of Bar Examiners to practice law in the Courts of the Commonwealth of Virginia on October 2, 1984.

(3) I have been engaged in the private practice of law in Roanoke, Virginia since February 1986, presently with the firm of Terry N. Grimes, Esq., P.C. My practice has been devoted almost exclusively to litigation with a focus on employment and criminal law. I have tried numerous cases in federal and state courts.

(4) I am a member of the Virginia State Bar, the Virginia Bar Association, the Federal Bar Association, the Fourth Circuit Judicial Conference, the City of Roanoke and Salem-Roanoke County Bar Associations, the Virginia Trial Lawyers Associations, and the National

Employment Law Association. I participate in and lecture frequently at continuing legal education seminars concerning employment law.

(5) I am counsel of record for plaintiff Sandra M. Davis in the above-reference action.

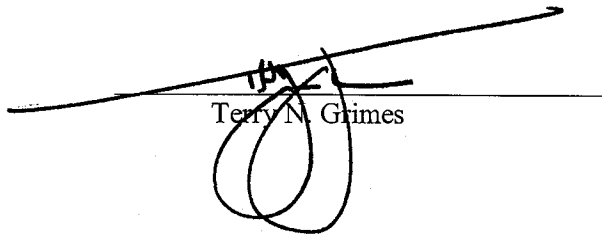
(6) On August 3, 2015, defendant Lendmark Financial Services, LLC filed a motion to compel arbitration and stay proceedings pending arbitration with a supporting memorandum (ECF 12). In support of the motion, Lendmark attached the declaration of Kristen Stapp with supporting documents (ECF No. 12-2, 12-3, 12-4, 12-5, and 12-6).

(7) After the motion was filed, plaintiff contacted defendant, through counsel, to schedule the deposition of the defense affiant.

(8) The declaration of the defense witness is central to the defendant's motion. Without the requested discovery, plaintiff cannot respond adequately to the motion filed by defendant.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

8/6/15  
Date

  
Terry N. Grimes